

REMARKS/ARGUMENTS

Claims 1-28 remain in this application for further review. Claims 1, 3-4, 8, 13, 15-16, and 20 are currently amended as set forth above. Claims 14, 17-19, and 21 have been previously presented and claims 2, 5-7, 9-12 and 22-28 are original. No new matter has been added.

I. Rejection of claims 1-7 and 13-19 under 35 U.S.C. 102(e)

Claims 1-7 and 13-19 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,259,908 issued to Austin ("Austin"). Applicants respectfully disagree with the rejection. When applicants' claims are read *as a whole* and the cited references are read *as a whole*, the references simply do not teach or otherwise suggest all the elements of the claims.

Even though applicants disagree with the rejection, applicants have amended claims 1, 3-4, 8, 13, 15-16, and 20 as set forth above to further clarify this matter. Austin simply does not teach or otherwise suggest all the limitations of claims 1-7 and 13-19 as currently propounded in the Office Action. Applicants' amended claim 1 specifically recites the following elements that are not taught or suggested by the Austin reference:

"identifying the source of the received message from data associated with the received message" (Emphasis added).

"associating a security role with the received message based on the identified source of the received message" (Emphasis added).

"comparing the associated security role of the received message with a security privilege associated with the at least one configuration setting on the mobile device" (Emphasis added).

"if the associated security role of the received message is in agreement with the security privilege associated with the at least one configuration setting on the

mobile device, processing the request associated with the configuration information" (Emphasis added).

Applicants' amended claim 13 specifically recites the following elements that are not taught or suggested by the Austin reference:

"identifying the source of the received message from data associated with the received message" (Emphasis added).

"associating a security role with the instruction based on the source of the received message" (Emphasis added).

When the aforementioned elements are read in light of the claim in its entirety, Austin does not teach or otherwise suggest at least these limitations. Austin teaches a method of limiting access, over-the-air, to data stored in a cellular telephone and limiting activation of a cellular telephone in a designated network. *Austin*, at col. 12, lines 50-53. With reference to Figure 5 of Austin, Austin teaches that in step 504, the cellular telephone monitors whether configuration data of the cellular telephone has been requested by an entity. *Austin*, at col. 10, lines 27-31. Austin does not teach anything more than monitoring to see if a request has been made.

Once a request has been made, *the cellular phone sends a separate message back to the base station*. *Austin*, at col. 10, lines 42-45. (Emphasis added). The information in *the message that is received by the base station* is used to calculate an authorization key *at the base station*. *Austin*, at col. 11, line 60-col. 12, line 22. (Emphasis added). Austin continues by teaching that the computer system of the base station has a program that decrypts the message *that was sent by the cellular telephone*. *Austin*, at col. 11, lines 1-7 (Emphasis added). Once the computer decrypts the message, the computer *at the base station generates an authorization key*. *Austin*,

at col. 11, lines 7-11 (Emphasis added). The computer is then required to transmit the *key back to the cellular telephone*. Austin, at col. 12, lines 20-22 (Emphasis added). Austin teaches the above because Austin pertains to the *activation of a cellular telephone* and as such, the cellular telephone is required to transmit the information to the base station. As recited above in claims 1 and 13, those claims include steps on the mobile device involving the "received message." Austin cannot possibly teach the steps in claims 1 and 13 in that Austin requires back-and-forth transmission of various messages between the cellular telephone and the base station. Accordingly, Austin cannot possibly anticipate independent claims 1 and 13 of the present invention.

Regarding claims 2-7 and 14-19, Applicants assert that the limitations of those claims are not taught or otherwise suggested by the cited art. Moreover, claims 2-7 and 14-19 ultimately depend from independent claims 1 and 13, respectively. Claims 1 and 13 are clearly allowable as more fully set forth above. Therefore, claims 2-7 and 14-19 are also thought allowable for at least those same reasons.

II. Rejection of claims 20 and 25-28 under 35 U.S.C. 102(e)

Claims 20 and 25-28 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,161,139 issued to Win et al. ("Win"). Applicants respectfully disagree with the rejection. Win does not teach all the limitations of the claims. When applicants' claims are read *as a whole* and the cited references are read *as a whole*, the references simply do not teach or otherwise suggest all the elements of the claims.

Even though applicants disagree with the rejection, applicants have amended the claims as set forth above to further clarify this matter. Win simply does not teach or otherwise suggest all the limitations of claims 20 and 25-28 as currently propounded in the Office Action. Applicants' amended claim 20 specifically recites the following elements that are not taught or suggested by the Win reference:

"a second field identifying an associated configuration service provider, the identity indicating an associated configuration service provider requesting information stored on the mobile device" (Emphasis added).

"a third field correlating a security role based on the identity of the associated configuration service provider, the security role of the configuration service provider identifying a provider privilege which must be had in order to make use of the configuration service provider" (Emphasis added).

When the aforementioned elements are read in light of the claim in its entirety, Win does not teach or otherwise suggest at least these limitations. Applicants can find no teaching whatsoever of "a second field identifying an associated configuration service provider, the identity indicated an associated an associated configuration service provider requesting information stored on the mobile device." Moreover, applications can find no teaching of "a third filed field correlating a security role based on the identity of the associated configuration service provider..." Accordingly, applicants believe that independent claim 20 is allowable over the aforementioned rejection.

Regarding claims 25-28, Applicants assert that the limitations of those claims are not taught or otherwise suggested by the cited art. Moreover, claims 25-28 ultimately depend from independent claim 20. Claim 20 is clearly allowable as more fully set forth above. Therefore, claims 25-28 are also thought allowable for at least those same reasons.

III. Rejection of claims 8-12 under 35 U.S.C. 103(a)

Claims 8-12 were rejected under 35 U.S.C.103(a) as being unpatentable over Austin, and further in view U.S. Patent No. 6,301,484 issued to Rogers et al. ("Rogers"). Applicants respectfully disagree with the Office Action. There is no suggestion in either of the references that they may be combined in the manner suggested. Austin pertains to the activation of a cellular telephone and does not pertain to the routing of configuration messages. In fact, without activation of the phone a configuration message, such as the configuration message of Rogers could not reach the system taught in Austin in that Austin teaches activation. Accordingly, a person of ordinary skill in the art would not consider the proposed combination.

Furthermore, even if the above references could be combined for argument sake, they still fail to teach all the limitations of the claims. Applicants' claim 8, as amended, specifically recites the following elements that are not taught or suggested by the proposed combination:

"a router configured to receive a configuration message over a wireless communication link, the router being further configured to identify a source of the configuration message and *assign a security role to the received configuration message based on the identified source, the router being further configured* to pass the configuration message to other components of the mobile device, the configuration message including an instruction that affects a configuration setting" (Emphasis added).

"a configuration manager configured to receive the configuration message from the router and to parse the configuration message to identify the configuration setting affected by the configuration message, the configuration manager being further configured to compare *the assigned security role of the configuration message* to security roles assigned to configuration settings stored on the mobile device" (Emphasis added).

"wherein if the configuration setting identified in the configuration message identifies the stored setting, and wherein if the *assigned security role* has sufficient privilege to access the stored setting, the configuration manager causes the instruction that affects the configuration setting to be processed" (Emphasis added).

With regard to at least the above limitations, applicants rely on the explanation of the Austin reference set forth above in support for claim 1. Furthermore, the Rogers reference does not teach the limitations set forth in the Office Action. Accordingly, Claim 8 is clearly allowable under 35 U.S.C. 103(a).

Regarding claims 9-12 of the present invention, none of the cited art teaches or otherwise suggests the limitations of those claims. Furthermore, claims 9-12 ultimately depend from independent claim 8. Claim 8 is clearly allowable as set forth above, and as such, applicants assert that claims 9-12 are also allowable.

IV. Rejection of claims 21-24 under 35 U.S.C. 103(a)

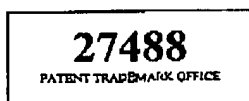
Claims 21-24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Austin, and further in view of Win. Applicants respectfully disagree with the above-stated rejections. Applicants assert that the prior art cannot be modified in the manner suggested in the Office Action. Also, all the limitations of claims 21-24 are not taught or otherwise suggested by the cited art; the Austin and Win references have not been considered in their entirety as set forth above. Furthermore, the Examiner's 35 U.S.C. 103(a) rejection depends from the above-stated 35 U.S.C. 102(e) rejection of claim 20. Claim 20 is clearly patentable under 35 U.S.C. 102(e), and therefore, the Office Action's 35 U.S.C. 103(a) assertion have been obviated.

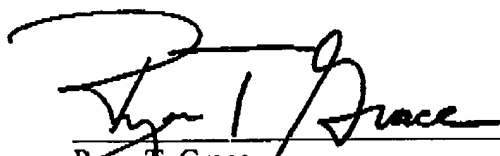
In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application,

the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

MERCHANT & GOULD P.C.




Ryan T. Grace
Registration No. 52,956
Direct Dial: 206.342.6258

MERCHANT & GOULD P.C.
P. O. Box 2903
Minneapolis, Minnesota 55402-0903
206.342.6200